

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2018-2-E**

IN RE: Annual Review of Base Rates for	)	
Fuel Costs for South Carolina	)	
Electric & Gas Company	)	
	)	
	)	
	)	<b>MOTION TO BIFURCATE ISSUES (Exigent Relief Requested)</b>

**INTRODUCTION**

On December 22, 2017, South Carolina Electric & Gas Company (“SCE&G, or “Company”) filed a Request for a Waiver of this Commission’s requirement that (i) SCE&G update its PR-2 Rate Schedule in December, 2017 (ii) SCE&G also indicated that SCE&G would change its avoided costs methodology and (iii) SCE&G also requested that both of these issues be incorporated into SCE&G’s annual fuel case Docket (hereinafter as, “Waiver Request”). The South Carolina Solar Business Alliance (“SCSBA”), filed Opposition to SCE&G’s Waiver Request, as did other parties. This Commission issued its Directive Order on January 24, 2018, Order No. 2018-55, allowing the relief sought in SCE&G’s Waiver Request. The Commission’s decision allowed SCE&G to combine the two important issues listed above, along with the issues in a regular fuel case Hearing.

**MOTION TO BIFURCATE ISSUES**

SCSBA attempted to properly respond to the Company’s voluminous filing of Testimony and Exhibits and attempted to provide responsive Testimony on the issues of (i) SCE&G’s PR-2 Rate Update (ii) SCE&G’s change in its avoided costs methodology and (iii) the issues inherent in SCE&G’s annual fuel case, (hereinafter, “Three Issues”).

SCSBA retained an Expert Witness and made a good-faith attempt to respond to the Three Issues. SCSBA had roughly thirty days to (i) hire an Expert Witness (ii) prepare a discovery request (iii) receive and review a discovery response from the Company (iv) receive and review the Company’s voluminous Testimony and Exhibits and (v) prepare responsive Testimony on the Three Issues. The grounds for SCSBA’s Motion follows.

Due Process Issue.

Based on the foregoing, if SCSBA and other parties are forced to adhere to the pre-filing deadlines in place in this Docket, SCSBA and other parties will be deprived of their due process rights to be heard on the Three Issues. This argument is not a criticism of this Commission, and the lack of due process affecting SCSBA and other parties is not a result of any explicit intention by this Commission. Rather the lack of due process is implicit in the Commission's accommodation to SCE&G's Waiver Request. SCSBA will file the Testimony that it was able to complete, with a Reservation of Rights related to this Motion and the Petition of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy, filed March 21, 2018, in Docket 2017-2-E.

SCSBA's Expert Witness.

Dr. Ben Johnson, SCSBA's retained Expert Witness, has candidly admitted to representatives of SCSBA, that he was unable to provide comprehensive, responsive Testimony on the Three Issues in the time allowed for his Testimony preparation.

## CONCLUSION

Based on the foregoing, this Commission should bifurcate the issues of SCE&G's PR-2 Rate update and SCE&G's request to change the avoided costs methodology, from this fuel case Docket. This Commission should issue its Order bifurcating the two issues described hereinabove from the fuel case and allow parties to file supplemental Testimony responsive to the issues of SCE&G's annual fuel case. This Docket may continue as envisioned by this Commission's scheduling SCE&G's annual fuel case, inputs can be made and a fuel factor can be determined, the planned Hearing on April 10, 2018, may be held and the new fuel factor may go into effect in the first billing cycle of May, 2018, as is customary. SCSBA reserves the right to file a Memorandum in this matter. SCSBA respectfully request that this matter be heard on an expedited basis.

**[Signature Page Follows]**

Respectfully Submitted,

/s/

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